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Attorneys for Defendants,
Stephen Fairfax and MTechnology

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SWITCH, LTD.,
a Nevada limited liability company,
Plaintiff,

vs.

STEPHEN FAIRFAX; MTECHNOLOGY;
DOES 1 through 10; and ROE ENTITITIES
11 through 20, inclusive,

Defendants.

Case No. 2:17-cv-02651-GMN-VCF

STIPULATION AND [PROPOSED]
ORDER TO STAY PROCEEDINGS

IT IS HEREBY STIPULATED and agreed by and between Plaintiff, Switch, Ltd. ("PLAINTIFF") and Defendants Stephen Fairfax and MTechnology ("DEFENDANTS") by and through their respective undersigned counsel as follows:

1. The aforesaid parties are currently engaged in good-faith settlement negotiations.

2. Further, the parties are currently in the process of engaging in informal discovery to attempt to resolve this lawsuit, have chosen an e-discovery provider for the purposes of engaging in informal discovery, and are currently in final negotiations regarding the parameters of informal discovery.

1 3. In the meantime, to facilitate informal discovery and potential
2 settlement and to minimize attorneys' fees and other legal expenses, the parties
3 believe that the present civil action should be stayed, including a stay on
4 subsequent deadlines.

5 4. Therefore, the parties agree that the Court may enter the following
6 order and request that the Court do so accordingly:

7 a. Except as otherwise provided below, this action shall be
8 stayed for a period of 120 days from the date this stipulation is filed with the Court,
9 or Friday, May 24, 2019;

10 b. The stay shall immediately terminate at midnight on Friday,
11 May 24, 2019; and

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